

Little Goose Lock and Dam – SPCC Inspection 11/30/2022

Inspector Comments

(OSC Richard Franklin)

On Wednesday, November 30, 2022, EPA inspector Richard Franklin and EPA contractor Cassidy Owen (hereinafter, EPA Inspection Team) conducted an SPCC inspection at the Little Goose Lock and Dam (hereinafter, Facility) in Dayton, Washington. The Facility is located in Columbia County and extends across the Snake River, such that a spill from the Facility could directly enter the Snake River.

Richard Franklin was the lead EPA inspector for this inspection. The Facility is owned and operated by the U.S. Army Corps of Engineers Walla Walla District. The Facility's ECC, Samantha Strevy, Chief of Maintenance, Ben Feider, Chief of Tech, Jack Bryson, and District ECC, Matthew Drumheller, were present during the inspection. The EPA Inspection Team conducted a standard inspection with an opening conference, field inspection, plan review, records review, and closing conference with Facility personnel.

The EPA Inspection Team observed the Facility to be orderly, clean, and maintain good housekeeping. Most of the Facility's bulk storage tanks were stored within a concrete containment room without drainage that served as secondary containment. Tanks outside of the concrete containment room were double walled. Drainage from the Facility's turbine pits flows to an oil/water separator and then a belt skimmer before entering the 140,000-gallon sump in the powerhouse basement, which discharges to the Snake River. The large oil-filled transformers on the top of the Dam had concrete secondary containment structures.

The following SPCC deficiencies were made during the SPCC inspection:

- 112.5(a) DEFICIENCY, PLAN: For the current plan updates, the facility has implemented more effective technology (e.g., OWS for turbine pits, belt skimmer) but did not update the plan within 6 months.
- 112.5(b) DEFICIENCY, PLAN: 7 years passed between last plan review (2015) and current plan review (2022). The Facility is planning to complete the current plan update by the end of this month. The update of the plan was delayed due to COVID and staff turnover.
- 112.7(a)(2) DEFICIENCY, PLAN: The plan deviates from 112.8(c)(3) for drainage of sumps without inspection for accumulated oil, but they have an environmental equivalence set up with the belt skimmer, oil sensor, and oil/water separator for the turbine pits. The SPCC Plan does not adequately explain the reasons for the deviation and how the alternate measures provide equivalent environmental protection.

- 112.7(a)(3) DEFICIENCY, PLAN: Facility diagrams are missing locations of oil-filled piping.
- 112.7(a)(4): DEFICIENCY, PLAN: The Appendix C Spill Report Form does not include all of the items required by 112.7(a)(4), including: estimates of the quantity discharged per 112.1(b), source of the discharge, description of all affected media, cause of the discharge, or whether an evacuation is needed.
- 112.7(c) DEFICIENCY, FIELD: The EPA Inspection Team observed piping near the backup diesel tank that has no containment and is a few feet away from a drain to the river (refer to Photographs 8 and 9).
- 112.7(e) DEFICIENCY, PLAN: Section 3.7 of the SPCC Plan does not state that inspections or tests are signed by a supervisor or inspector.
- 112.8(c)(6) DEFICIENCY, PLAN: The SPCC Plan is missing an integrity testing schedule for bulk storage tanks, discussion of inspecting container supports/foundations regularly, and discussion of observing the outside of containers for signs of deterioration, discharges, or accumulated oil.
- 112.8(c)(9): DEFICIENCY, PLAN: The SPCC Plan does not state how frequently the belt skimmer system or oil/water separator are inspected.
- 112.8(d)(2,3) DEFICIENCY, PLAN: The SPCC Plan does not state that piping terminal connections at the transfer point are marked as to the origin and capped or blank-flanged when not in service or in standby service for an extended time. Additionally, the SPCC Plan does not state that pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction.
- 40 CFR Part 109 and Attachment C SPCC Contingency Plan DEFICIENCY: The Facility's Oil Spill Contingency Plan (dated July 3, 2019) is missing the following items (refer to Attachment C of this checklist):
 - (a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.
 - (b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge.
 - (c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation.
 - (d) Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge.

(e) Specific and well-defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.

The following recommendations were also made during the SPCC inspection:

- 112.7 RECOMMENDATION, PLAN: The cross-reference should be more specific to each subsection of the regulations and refer to page numbers or sub-sections of the SPCC plan, not just the high-level section.
- 112.7(a)(3)(v) RECOMMENDATION, PLAN: Recommend the SPCC Plan discussion regarding disposal of recovered materials be bolstered with additional details.
- 112.7(c) RECOMMENDATION, PLAN: The potential discharge table (Table 3.2) lists "active measures" as secondary containment for a number of equipment spills, some of which are hundreds to thousands of gallons. These volumes do not show the "likely" spill scenario, but instead the full range of spills. Recommend the "likely" spill scenario be clarified.
- 112.7(e) RECOMMENDATION, PLAN: Section 3.7 of the SPCC Plan states that examples of inspection checklists are in Appendix D, but they are not there. Appendix D only contains frequencies for different types of inspections. Recommend these checklists be added to Appendix D.
- 112.8(b)(3,4) RECOMMENDATION, PLAN: The SPCC Plan does not adequately claim environmental equivalence for drainage per 112.8(b)(3,4) based on the belt skimmer and oil detection system at the Facility. Recommend this be added to the SPCC Plan.
- 112.8(c)(11) RECOMMENDATION, FIELD: The EPA Inspection Team observed empty 275-gallon totes of used oil stored outside on spill pallets that were intended for 55-gallon drums and did not have adequate secondary containment for the full totes (refer to Photographs 11 and 12). The totes were empty, but had previously contained oil collected from a spill cleanup. Recommend these totes be placed on spill pallets with adequate secondary containment for the full volume of the container.